

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, et al.,

Debtors.¹

Chapter 11

Case No. 23-11069 (CTG)

Objection Deadline: February 7, 2024 at 4:00 pm (ET)

Hearing Date: February 14, 2024 @ 10:00 am (ET)

**LIMITED OBJECTION OF TEAMSTERS LOCAL 641 PENSION FUND
AND THE TEAMSTERS LOCAL 641 WELFARE FUND TO DEBTORS’
MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE
ABANDONMENT AND DESTRUCTION OF CERTAIN DOCUMENTS
AND RECORDS**

The Teamsters Local 641 Pension Fund and the Teamsters Local 641 Welfare Fund, by and through undersigned counsel, hereby file this limited objection to Debtors’ Motion for Entry of an Order Authorizing the Abandonment and Destruction of Certain Documents and Records (the “Motion”) and in support thereof states as follows:

1. The Teamsters Local 641 Pension Fund and the Teamsters Local 641 Welfare Fund have claims pending in the above captioned Chapter 11 cases and file this limited objection to the Motion to the extent that the documents and records sought to be destroyed contain the following: W2 Forms, W3 Forms, weekly payroll journals, weekly time sheets or daily time cards, state quarterly tax returns, federal quarterly tax returns, cash disbursement journals, general ledgers, cancelled checks and check registers, Federal Forms 1096 and 1099, Federal Income Tax returns, remittance reports to all trades, employee identification list, subcontractor invoices and job identification lists.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

2. The Teamsters Local 641 Pension Fund and the Teamsters Local 641 Welfare Fund hope that Debtors' counsel will provide assurances that none of the aforementioned records will be destroyed, but file this objection as a protective measure in case no resolution is reached.

WHEREFORE, to the extent provided herein, the Teamsters Local 641 Pension Fund and the Teamsters Local 641 Welfare Fund respectfully request that this Court enter an order denying the Motion and granting such other and further relief as the Court deems proper and just.

Dated: February 7, 2024
Wilmington, Delaware

GELLERT SCALI BUSENKELL & BROWN, LLC

/s/Michael Busenkell

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